CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 94-128

SITE CLEANUP REQUIREMENTS FOR:

**EDDIE AND DOLLY YANG, DOING BUSINESS AS KING'S COURT CLEANERS**

**KINGSCO, AND**

**SUE JETT, RICHARD C. CONGER, AND ESTHER R. RICE, TRUSTEE OF THE ESTHER R. RICE REVOCABLE TRUST**

for the property located at

**728 BLOSSOM HILL ROAD**
**LOS GATOS**
**SANTA CLARA COUNTY**

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter called the Board) finds that:

1. Site Location and Description The site is located on 728 Blossom Hill Road in the southeast corner of the intersection of Los Gatos Boulevard and Blossom Hill Road, in the City of Los Gatos, Santa Clara County, south of the San Francisco Bay. The site is bounded on the north by an Exxon service station and Blossom Hill Road, on the south by restaurant and residential development, on the west by Los Gatos Boulevard, and on the east by a residential apartment complex.

2. The subject site was historically an orchard until 1960's, when it was developed as a retail shopping center, King's Court Shopping Center. The site is now surrounded by commercial development or residential homes.

3. Site History and Regulatory Status Sue Jett, Richard C. Conger, and Esther R. Rice, Trustee of the Esther R. Rice Revocable Trust are the current owners of the real property. KINGSCO, a general partnership, that includes Frank J. Lodato, Charles H. Gunn, Lindley H. Miller, Jr., and Pacific Real Estate Investment Trust, leases the property and owns all the improvements at the King's Court Shopping Center. Since the site developed in 1960's, there has been a dry cleaning establishments at the area. Mr. Donner operated a dry cleaning business at the site from 1961 to about 1971-72. Preliminary assessment and investigation results indicated no record of former company

name or chemical usage history.

4. From 1977 to 1980, Eddie and Dolly Yang subleased the 728 Blossom Hill Road property and operated a dry cleaning business King's Court Cleaners at the property. The Yangs utilized about 100 gallons of tetrachloroethene (PCE) per year for their dry-cleaning business. PCE was delivered and dispensed directly into the dry-cleaning machine's storage tank. The Yangs did not use external storage tanks at the site. The former dry-cleaning location is now occupied by a stationary store. Currently, the Yangs operate King's Court Cleaners at different location in King's Court Shopping Center at 798 Blossom Hill Road.

5. KINGSCO performed a phase I preliminary site assessment at the site in late 1993. KINGSCO found a dry-cleaning machine at the 798 Blossom Hill Road facility. The Yangs obtain a 1986 permit to operate the machine, but they do not actually perform dry-cleaning on the site at this time.

6. KINGSCO also conducted soil and shallow groundwater investigation underneath the 728 Blossom Hill Road facility in December 1993 and January 1994. Elevated levels of PCE, a common dry-cleaning solvent, have been identified in soil and groundwater at the site. Based on the apparent distribution of PCE in soil and groundwater at the site, the former dry-cleaning facility at the site appears to be a likely contaminant source.

7. The Yangs are named as dischargers based on their chemical usage history during their occupancy of the site from 1977 to 1980 and the distribution of soil and groundwater contamination at the 728 Blossom Hill Road facility. KINGSCO is named as a discharger because it is the current lessee of the property and owns the improvements at the site. Sue Jett, Richard C. Conger, and Esther R. Rice, Trustee of the Esther R. Rice Revocable Trust are named as dischargers because they are current owners of the property. If additional information is submitted indicating that any other parties caused or permitted any waste to be discharged on the site where it entered or could have entered waters of the State, the Board will consider adding that party's name to this Order.

8. <u>Hydrogeology</u> The site is located south of San Francisco Bay within the South Bay recharge zone. The South Bay recharge zone lies within the Coast Range and generally consists of a broad alluvial valley sloping northward towards the San Francisco Bay adjacent to the Saratoga Upland, on the southern edge of the West Side Alluvial Apron of the San Jose Plain. The San Jose Plain

deposits in the site vicinity are reported to extend to depths of approximately 150 feet and consist of unconsolidated deposits of gravel, sand and silt, with localized clay layers that form aquitards. The regional groundwater gradient runs parallel to the axis of the valley, generally northeastward.

9. The depth to water in the Los Gatos area varies locally and fluctuates seasonally. Groundwater in the site vicinity was generally encountered between 45 to 70 feet below ground surface. Based on the groundwater elevation data collected during the site investigation, the direction of the shallow groundwater flow underneath the site is northerly.

10. Adjacent Sites An Exxon (formerly Texaco) gas station exists north and downgradient to the site. Exxon is currently conducting on-site investigation in connection with potential petroleum hydrocarbon contamination not solvent. No other sites are identified at the site vicinity that could be a potential source of solvents.

11. Soil Investigation and Remediation KINGSCO initiated soil investigation to evaluate the distribution of contaminants in soil at the site related to existing and former dry-cleaning establishments in late 1993 and early 1994. Overall about 27 soil samples were collected from borings at five-foot interval to about 50 foot depth and analyzed using EPA analytical method 8010. PCE was measured up to 3.7 ppm in soil samples collected from borings immediately downgradient of the former dry-cleaning establishment.

12. Additional soil investigation is needed in areas that have not investigated yet. Soil remediation is also needed to prevent further leaching of contaminants to groundwater.

13. Groundwater Investigation and Remediation KINGSCO conducted shallow zone groundwater investigation to determine the extent of the plume and characterize the site. Eight shallow groundwater monitoring wells were installed at the site. Water samples from the monitoring wells measured high volatile organic compounds, primarily PCE. Groundwater samples collected immediately downgradient of the former dry-cleaning facility detected up to 8,700 ppb of PCE. Other contaminants such as chloroform, trichloroethene, and cis-1,2-dichloroethene were also detected in concentrations below drinking water standards. The distribution of contaminants in groundwater was consistent with soil analytical data.

14. The existing eight shallow groundwater monitoring wells are inadequate to demonstrate the vertical and lateral extent of the plume. Additional groundwater investigation is needed to address this issue. So far, no groundwater remediation has been implemented at the site, and interim remedial measures for groundwater are needed to reduce VOC concentrations and restore water quality.

15. Technical Reports

KINGSCO has submitted the following reports to the Regional Board:

- Phase I Preliminary Site Assessment (December 27, 1993) submitted April 6, 1994.

- Soil and Groundwater Quality Investigation (February 14, 1994) submitted March 3, 1994.

The Yangs have submitted a chemical usage history report on June 29, 1994.

16. Water Quality Control Plan The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Region (Basin Plan) on December 17, 1986, and the State Board approved it on May 21, 1987. The Basin Plan contains water quality objectives and beneficial uses for the South San Francisco Bay and contiguous surface and ground waters.

17. The existing and potential beneficial uses of the groundwater underlying and adjacent to the facility include:

    a. Municipal and Domestic water supply
    b. Agricultural water supply.
    c. Industrial process water supply
    d. Industrial service water supply

The Santa Clara Valley Water District prohibits installation of shallow wells in the county. Thus, the shallow aquifer underlying the site is not currently used for any of the above purposes. However, this shallow aquifer is a recharge zone for the deep aquifer at the Santa Clara Valley and needs to be restored.

18. The discharger has caused or permitted waste to be discharged or deposited where it is or probably will be discharged to waters of the State and creates or

threatens to create a condition of pollution or nuisance.

19. This action is an Order to enforce the laws and regulations administered by the Board. This action is categorically exempt from the provisions of CEQA pursuant to Section 15321 of the Resources Agency Guidelines.

20. Pursuant to Section 13304 of the Water Code, the dischargers are hereby notified that the Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abtatement of the effects thereof, or other remedial action, required by this Order.

21. The Board has notified the dischargers and all interested agencies and persons of its intent under California Water Code Section 13304 to prescribe Site Cleanup Requirements for the dischargers and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations.

22. The Board, at a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that the dischargers shall cleanup and abate the effects described in the above findings as follows:

A. PROHIBITIONS

1. The discharger of wastes or hazardous materials in a manner which will degrade water quality or adversely affect beneficial uses of the waters of the State is prohibited.

2. Further significant migration of pollutants through subsurface transport to waters of the State is prohibited.

3. Activities associated with the subsurface investigation and cleanup which will cause significant adverse migration of pollutants are prohibited.

B. SPECIFICATIONS

1. The storage, handling, treatment or disposal of polluted soil or groundwater shall not create a nuisance as defined in Section 13050(m) of the California Water Code.

2. The dischargers shall conduct site investigations and monitoring activities as determined by the Executive Officer to define the current local hydrogeological conditions, and the lateral and vertical extent of the soil and groundwater pollution. Should monitoring results show evidence of pollution migration, additional plume characterization of pollutant extent may be required.

C. PROVISIONS

1. The dischargers shall perform all investigations and remedial work in accordance with requirements of this Order.

2. The dischargers shall submit to the Board acceptable monitoring program reports containing results of work performed according to the attached self-monitoring program.

3. The dischargers shall comply with all Prohibitions and Specifications of this Order, in accordance with the following schedule and tasks:

a. **COMPLETION DATE: DECEMBER 16, 1994**

**TASK 1: GROUNDWATER CONSERVATION:** Submit a technical report acceptable to the Executive Officer which documents compliance or intent to comply with Board Resolution No. 88-160, "Regional Board Position on the Disposal of Extracted Groundwater From Groundwater Cleanup Projects."

b. **COMPLETION DATE: DECEMBER 16, 1994**

**TASK 2: WORKPLAN FOR REMEDIAL INVESTIGATION AND INTERIM REMEDIAL MEASURES FOR SOIL AND GROUNDWATER:** Submit a workplan acceptable to the Executive Officer that proposes additional remedial investigation and interim remedial measures for soil and groundwater at the site. The workplan should also include the schedule

for implementation of interim remedial measures at the site.

c. **COMPLETION DATE: JUNE 15, 1995**

**TASK 3: RESULTS OF INVESTIGATION:** Submit a technical report acceptable to the Executive Officer that describes the results of the investigation. The report shall include, but not limited to, the following information, if applicable:

i) new soil borings and groundwater monitoring well installation logs;

ii) copies of new well installation permits;

iii) tabulated results of soil and groundwater pollutant analyses;

iv) appropriately scaled maps;

v) soil boring and groundwater monitoring well locations;

vi) site-specific geologic cross sections;

vii) explanation of vertical and lateral extent of the soil and groundwater pollution;

viii) an evaluation of potential conduits for the vertical migration of pollutants;

ix) description of the site hydrogeologic conditions;

x) evaluation of the extent to which soil pollution may be contributing to groundwater pollution; and,

d. **COMPLETION DATE: JUNE 15, 1995**

**TASK 4: IMPLEMENTATIONS OF INTERIM REMEDIAL MEASURES FOR SOIL AND GROUNDWATER PLAN:** Submit a technical report acceptable to the Executive Officer which documents implementation of interim remedial measures for soil and groundwater pollution.

e. **TASK 5: Propose Remediation Action Plan**

**COMPLETION DATE: One year after the start-up of interim remedial measures described in Task 4**

Submit a technical report acceptable to the Executive Officer which contains a plan for the proposed remedial actions and implementation schedule. The report shall evaluate the effectiveness of the interim remedial actions which have been implemented. This report shall identify polluted soils and groundwater and evaluate the need and alternatives for the cleanup of polluted soils, control of a migrating groundwater pollution plume, or, conducting pilot or treatability studies for the proposed remedial actions. The proposed remedial alternatives shall reduce the volume, mobility, and toxicity of pollutants. Cleanup standards shall consider a risk-based approach for all pollutants that may remain in the soil or groundwater, in addition to the factors cited in Provision 6. The report shall include a schedule for the tasks and time schedule for implementation of the recommended remedial actions.

4. **COST REIMBURSEMENT:** The dischargers shall be liable, pursuant to Section 13304 of the Water Code, to the Board for all reasonable costs actually incurred by the Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. If the site addressed by this Order is enrolled in a State Board-managed reimbursement program, reimbursement shall be made pursuant to this Order and according to procedures established in that program. Any disputes raised by the dischargers over the reimbursement amounts or methods used in that program shall be consistent with the dispute resolution procedures of that program.

5. The submittal of technical reports evaluating interim cleanup measures will include a projection of the cost, effectiveness, benefits, and impact on public health, welfare, and environment of each alternative measure. The remedial action plan shall consider the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300); Section 25356.1 (c) of the California Health and Safety Code; CERCLA guidance documents with reference to Remedial Investigation, Feasibility Studies, and Removal Actions; and the State Water Resource Control Board's Resolution No. 68-16, "Statement of

Policy with Respect to Maintaining High Quality of Waters in California."

6. If the dischargers are delayed, interrupted or prevented from meeting one or more of the completion dates specified in this Order, the dischargers shall promptly notify the Executive Officer. In the event of such delays, the Board may consider modification of the task completion dates established in this Order.

7. All hydrogeological plans, specifications, reports and documents shall be signed by or stamped with the seal of a registered geologist, engineering geologist or professional engineer.

8. All samples shall be analyzed by State certified laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control records for Board review.

9. The dischargers shall maintain in good working order, and operate as efficiently as possible, any facility or control system installed by the dischargers to achieve compliance with the requirements of this Order.

10. The dischargers shall provide copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions, Specifications, and Provisions of this Order to the Santa Clara Valley Water District. the dischargers shall also provide copies of cover letters, title page, table of contents and the executive summaries of compliance reports (except for the annual progress reports, Proposal for Groundwater Remediation, and Proposal for Soil Remediation which shall be submitted in full) to the following agencies:

    a. Santa Clara County Health Department (Lee Esquibel)
    b. Central Valley Fire Protection District (Gordon Simpkinson)
    c. California EPA/DTSC Site Mitigation Branch (Barbara Cook)

    The Executive Officer may require the dischargers to provide copies to other parties, such as the U.S. Environmental Protection Agency, Region IX, and the local repository for public use.

11. The dischargers shall permit the Board or its authorized representatives, in accordance with Section 13267 (c) of the California Water Code,

access to copy any records required to be kept under the terms and conditions of this Order.

12. If any hazardous substance is discharged in or on any waters of the State, or discharged and deposited where it is, or probably will be discharged in or on any waters of the State, the discharger shall report such discharge to this Board, at (510) 286-1255 on weekdays during office hours from 8 AM to 5 PM, and to the Office of Emergency Services at (800) 852-7550 during non-office hours. A written report shall be filed with the Board within five (5) working days and shall contain information relative to: the nature of the waste or pollutant, quantity involved, duration of incident, cause of spill, estimated size of affected area, nature of effects, corrective measures that have been taken or planned, and a schedule of these activities, and persons, notified.

13. The Board will review this Order periodically and may revise the requirements when necessary.

I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on September 21, 1994.

Steven R. Ritchie
Executive Officer

Attachments: Self-Monitoring Report

# CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
# SAN FRANCISCO BAY REGION

## GROUNDWATER SELF-MONITORING PROGRAM

FOR

FORMER KING'S COURT CLEANERS

728 BLOSSOM HILL ROAD

Los Gatos, Santa Clara County

ORDER NO. 94-128

Adopted on September 21, 1994

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

FORMER KING'S COURT CLEANERS
728 Blossom Hill Road Site

GROUNDWATER SELF-MONITORING PROGRAM

## A. GENERAL

Reporting responsibilities of waste dischargers are specified in Sections 13225(a), 13267(b), 13283, 13383 and 13387(b) of the California Water Code and this Regional Board's Resolution No. 73-16.

The principal purposes of a monitoring program by a waste discharger, also referred to as self-monitoring program (SMP), are: (1) to document compliance with waste discharge requirements and prohibitions established by this Regional Board, (2) to facilitate self-policing by the waste discharger in the prevention and abatement of pollution arising from waste discharge, (3) to develop or assist in the development of effluent or other limitations, discharge prohibitions, national standards of performance, pretreatment and toxicity standards, and other standards, and (4) to prepare water and waste water quality inventories.

## B. SAMPLING AND ANALYTICAL METHODS

Sample collection, storage, and analyses shall be performed according to the EPA Method 8000 series in "Test Methods for Evaluating Solid Wastes, Physical/Chemical methods," dated November 1986; or other methods approved and specified by the Executive Officer of this Regional Board.

## C. REPORTS TO BE FILED WITH THE REGIONAL BOARD

### 1. Violation of Requirements

In the event the discharger is unable to comply with the conditions of the site cleanup requirements and prohibitions due to:

a. maintenance work, power failures, or breakdown of waste treatment equipment, or

b. accidents caused by human error or negligence, or

c. other causes, such as acts of nature, or

d. poor operation or inadequate system design,

the discharger shall notify the Regional Board office by telephone as soon as he or his agents have knowledge of the incident and confirm this notification in writing within five working days of the telephone notification. The written report shall include time, date, and person notified of the incident. The report shall include pertinent information explaining reasons for the noncompliance and shall indicate what steps were taken to prevent the problem from recurring.

2. The discharger shall file a written technical report to be received at least 30 days prior to advertising for bid (or 60 days prior to construction) on any construction project which would cause or aggravate the discharge of waste in violation of requirements; said report shall describe the nature, cost, and scheduling of all action necessary to preclude such discharge.

3. Self-Monitoring Reports

Written reports shall be filed quarterly due one month after the end of each calendar quarter until further notice is given by the Executive Officer.

The discharger shall notify Regional Board staff by telephone within fourteen days of receiving laboratory analytical results if (i) a chemical is detected which has not been detected previously, or (ii) if the concentration of any chemical in any well is at least one order of magnitude greater than detected the previous quarter.

The next quarterly report is due August 1, 1993. The reports shall be comprised of the following:

a. Letter of Transmittal:

A letter from the discharger transmitting the SMR should accompany each report. Such a letter shall include a discussion of requirement violations found during the reporting period and actions taken or planned for correcting any requirement violations. If the discharger has previously

submitted a detailed time schedule for correcting requirement violations, a reference to this correspondence will be satisfactory. Monitoring reports and the letter transmitting reports shall be signed by a principal executive officer or a duly authorized representative of that person.

The letter shall contain a statement by the official, under penalty of perjury, that to the best of the signer's knowledge the report is true and correct.

b. Results of Analyses and Observations

(1) Results from each required analysis and observation shall be submitted in the self-monitoring regular reports. Results shall also be submitted for any additional analyses performed by the dischargers at the specific request of the Board. Quarterly water level data shall also be submitted in the report.

(2) The SMR shall include the groundwater extraction rates from each extraction well, water level data from the extraction wells, the results of any aquifer tests conducted.

(3) The SMR shall include a discussion of unexpected operational changes which could affect performance of the extraction system, such as flow fluctuations, maintenance shutdown, etc.

(4) The SMR shall also identify the analytical procedures used for analyses either directly in the report or by reference to a standard plan accepted by the Executive Officer. Any special methods shall be identified and should have prior approval of the Board's Executive Officer.

(5) The discharger shall describe in the SMR the reasons for significant increases in a pollutant concentration at a well. The description shall include:

(a) the source of the increase,

(b) how the discharger determined or will investigate the

source of the increase, and

(c) what source removal measures have been completed or will be proposed.

(6) Original lab results shall be retained and shall be made available for inspection for six years after origination or until after all continuing or impending legal or administrative actions are resolved.

(7) The SMR shall include a summary of work completed since submittal of the previous report, design specifications if applicable, and work projected to be completed by the time of the next report.

(8) The SMR shall include tabulated results of self-monitoring water quality sampling analyses for all wells using analytical methods specified in item B of the SMP. Each report shall include updated isoconcentration maps of VOCs in groundwater.

(9) The SMR shall include updated water table and piezometric surface maps, based on the most recent water level measurements for all affected water bearing zones for all onsite and offsite wells. Interpretations of the data shall be discussed.

(10) A map or maps shall accompany the SMR, showing all sampling locations and plume contours for the predominant chemical(s), or other indicator chemicals upon request by the Executive Officer.

(11) The annual report may be combined with the fourth quarter regular report and shall include cumulative data for current year. The annual report for December shall also include minimum, maximum, median, and average water quality data for the year, and a summary of water level data. The report shall contain both tabular and graphical summaries of historical monitoring data.

4. SMP Revisions

Additional long term or temporary changes in the sample collection frequency and routine chemical analysis may become warranted as monitoring needs change. These changes shall be based on the following criteria and shall be proposed in a SMR. The changes shall be implemented no earlier than 45 days after the SMR is submitted for review unless approved in writing.

Criteria for SMP revision:

(1) Discontinued analysis for a routine chemical parameter for a specific well after a two-year period of below detection limit values for that parameter.

(2) Changes in sampling frequency for a specific well after a two-year period of below detection limit values for all chemical parameters from that well.

(3) Temporary increases in sampling frequency or changes in requested chemical parameters for a well or group of wells because of a change in data needs (e.g., evaluating groundwater extraction effectiveness or other remediation strategies).

(4) Add routine analysis for a chemical parameter if the parameter appears as an additional chromatographic peak in three consecutive samples from a particular well.

(5) Alter sampling frequency based on evaluation of collective data base.

D. DESCRIPTION OF SAMPLING STATIONS

All existing and future shallow and intermediate aquifer monitoring and extraction wells shall be monitored as appropriate. See Table 1 and Figure 2 for monitoring wells installed at the time of the adoption of this SMP.

E. SCHEDULE OF SAMPLING AND ANALYSES

1. All wells at the KINGSCO site shall be sampled according to the schedule

and methods given in Table 1. New monitoring wells shall be sampled quarterly for at least one year.

2. In addition, if a previously undetected compound or peak is detected in a sample from a well, a second sample shall be taken within a week after the results from the first sample are available. All chromatographic peaks detected in two consecutive samples shall be identified and quantified in the self-monitoring report.

3. Groundwater elevations shall be obtained on a quarterly basis from all wells at the site and submitted in the self-monitoring report with the sampling results.

4. Well depths shall be determined on an annual basis and compared to the depth of the well as constructed. If greater than ninety percent of screen is covered, the discharger shall clear the screen by the next sampling.

I, Steven R. Ritchie, Executive Officer, hereby certify that the foregoing self-monitoring Program:

1. Has been developed in accordance with the procedure set forth in this Regional Board's Resolution No. 73-16 in Order to obtain data and document compliance with site cleanup requirements established in Regional Board Order No. 94-128.

2. May be reviewed at any time subsequent to the effective date upon written notice from the Executive Officer or request from the discharger, and revisions will be ordered by the Executive Officer or Regional Board.

3. Was adopted by the Board on September 21, 1994.

9/21/94
Date

Steven R. Ritchie
Executive Officer

Attachments: Table 1 - Monitoring Schedule
Figure 2 - Wells Location Map

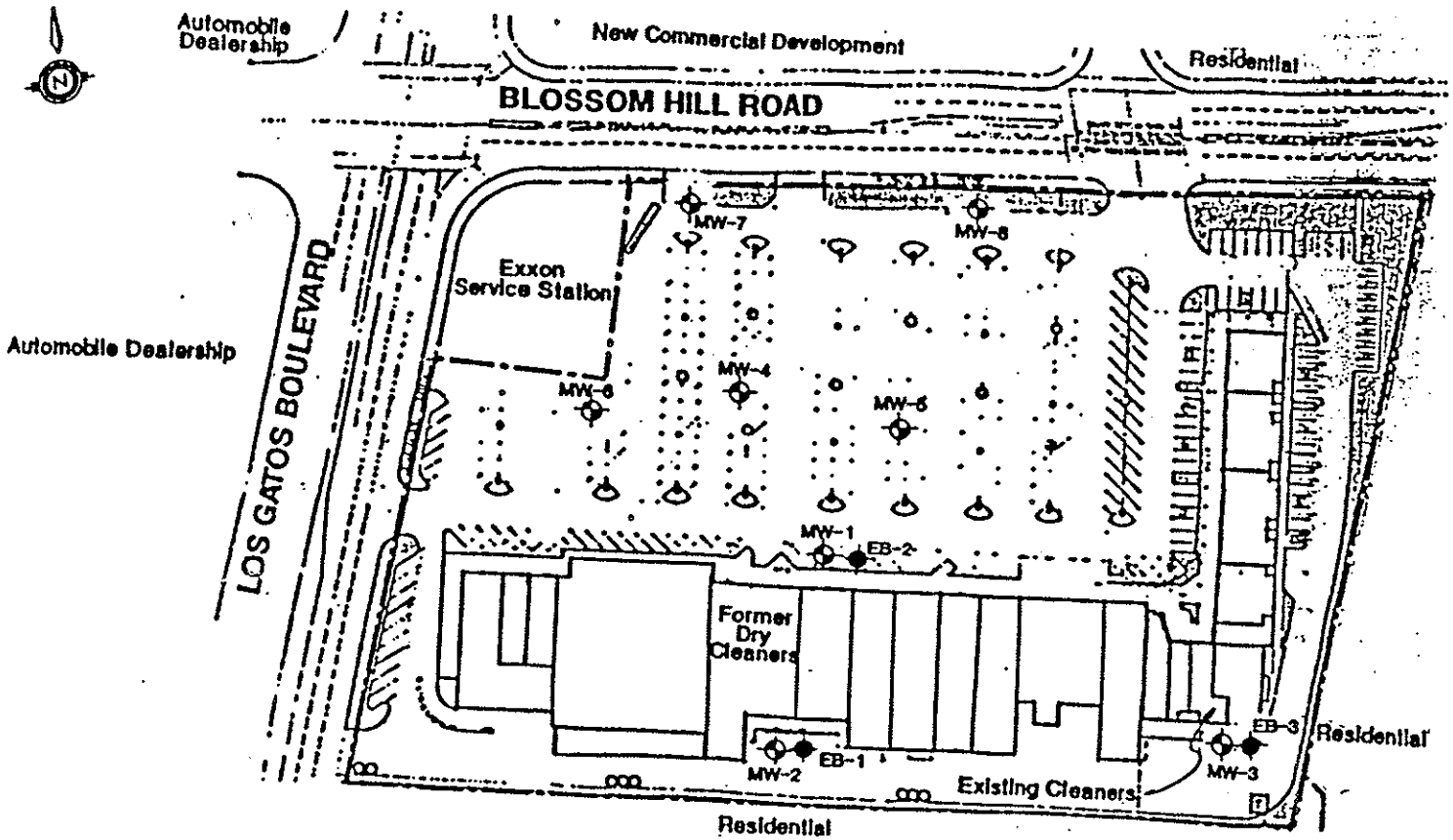
Table

Groundwater monitoring Schedule for
728 Blossom Hill Road Site

| Monitoring Well Location | Sampling Frequency |
|---|---|
| MW-1 | Quarterly |
| MW-2 | Quarterly |
| MW-4 | Quarterly |
| MW-5 | Quarterly |
| MW-8 | Quarterly |
| MW-3 | Annually |
| MW-6 | Annually |
| MW-7 | Annually |

*Note:* 1. *For quarterly monitoring, water samples should be analyzed for volatile organic compounds, using EPA Method 8010 in quarters 1, 2 & 3 and using EPA Method 8240 in quarter 4.*

2. *For annual monitoring, water samples should be analyzed for volatile organic compounds, using EPA Methods 8240.*




LEGEND

Site Boundary Line

MW-8 Approximate Location of Monitoring Well

EB-3 Approximate Location of Previous Exploratory Boring

Approximate Scale (feet)

0 50 100 200

HARZA KALDVEER
*Consulting Engineers*

SITE PLAN

KINGS COURT SHOPPING CENTER
Los Gatos, California

| PROJECT NO. | DATE | |
|---|---|---|
| K29CC | February 1994 | Figure 2 |